

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

TEXAS BANKERS ASSOCIATION; RIO)
BANK, MCALLEN, TEXAS;)
AMERICAN BANKERS ASSOCIATION,)
)
Plaintiffs,)
)
v.)
) Case No. 7:23-cv-00144
CONSUMER FINANCIAL)
PROTECTION BUREAU and ROHIT)
CHOPRA, in his official capacity as)
Director of the Consumer Financial)
Protection Bureau,)
)
Defendants.)

DECLARATION OF AMIE PALA

I, Amie Pala, hereby declare as follows:

1. The statements below are based on my personal knowledge.
2. I am the Chief Executive Officer at the Farm Credit Bank of Texas (the “Bank”). I have been at the Bank for approximately 36 years.
3. The Bank is headquartered in Austin, Texas and is a member of the Farm Credit Council (the “Council”). The Bank is not a member of the American Bankers Association or the Texas Bankers Association.
4. The Bank is one of four federally chartered Farm Credit System Banks created by the U.S. Congress as part of the Farm Credit System (the ‘System’) in 1916. The System’s mission is to support rural communities and agriculture with reliable, consistent credit and financial services.

5. As one of four System regional wholesale banks (the other banks being AgFirst Farm Credit Bank, AgriBank and CoBank), the Bank raises funds through the sale of debt securities by the Federal Farm Credit Banks Funding Corporation on behalf of all System-institutions, and uses those funds to fund fourteen of the System's sixty-seven individual associations that are located in Texas, Alabama, Mississippi, Louisiana and New Mexico.

6. These affiliated associations originate real estate mortgage loans, production and intermediate-term loans, agribusiness loans and rural residential real estate loans to support farmers, ranchers, and rural agribusinesses, including "covered credit transactions" for "small businesses" (as such terms are defined in the Final Rule issued by the Consumer Financial Protection Bureau ("CFPB") set forth in the *Small Business Lending Under the Equal Credit Opportunity Act* (Regulation B), 88 Fed. Reg. 35,150 (May 31, 2023) (the "Final Rule").

7. In addition to the funding that the Bank provides its affiliated associations, the Bank provides integrated technology solutions for loan origination, underwriting, loan accounting and servicing. A large majority of the associations rely on the Bank, in whole or in large part, to provide technology support that will aid the associations in complying with the Final Rule. Because the Bank is a cooperative primarily owned by its affiliated associations, the Bank's compliance costs are ultimately borne by all fourteen affiliated associations.

8. The Bank has already commenced its efforts to comply with the Final Rule and has expended a material number of hours in collaboration with affiliated associations to estimate compliance timeframes; analyze the technical requirements necessary to operationalize the data collection and reporting required by the Final Rule; identify and review systems impacted; and meet with and engage outside technology vendors to evaluate tools available to implement information data collection and reporting requirements.

9. During the balance of this year, 2023, and I estimate that the Bank will continue to incur substantial costs and labor hours to comply with the Final Rule including work to configure its loan origination system; update reporting applications, templates, and systems; revise procedures; manage privacy protections needed to safeguard the large volumes of information collected; purchase new computer software systems and technical support; integrate multiple systems to facilitate data collection and reporting; and devote additional resources to create system documentation and training for the associations as technology users. These costs and burdens will have a significant impact on and result in irreparable harm to the Bank and its affiliated associations.

10. Because the Bank's affiliated associations are not covered by the preliminary injunctions issued in this case, the Bank and its affiliated associations will (absent an injunction that applies to them) be forced to continue incurring costs to meet the Final Rule's compliance deadlines.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 8, 2023



Amie Pala
Chief Executive Officer
Farm Credit Bank of Texas